

LOCKE LORD LLP  
Meagan S. Tom (SBN 273489)  
meagan.tom@lockelord.com  
101 Montgomery Street, Suite 1950  
San Francisco, CA 94104  
Telephone: (415) 318-8810  
Fax: (415) 676-5816

Bradley C. Knapp (*pro hac vice pending*)  
bknapp@lockelord.com  
601 Poydras Street, Suite 2660  
New Orleans, Louisiana 70130  
Telephone: (504) 558-5210  
Fax: (504) 910-6847

W. Steven Bryant (*pro hac vice pending*)  
sbryant@lockelord.com  
600 Congress Street, Suite 2200  
Austin, Texas 78701  
Telephone: (512) 305-4700  
Fax: (512) 305-4800

Attorneys for Creditor  
*International Brotherhood of Electrical Workers Local Union 1245*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:	)	CASE NO.: 19-30088
	)	CASE NO.: 19-30089
PG&E CORPORATION and PACIFIC GAS &	)	
ELECTRIC COMPANY	)	Chapter 11
	)	
Debtors	)	(JOINT ADMINISTRATION
	)	PENDING)
	)	
	)	
	)	<b>NOTICE OF APPEARANCE AND</b>
	)	<b>DEMAND FOR SERVICE</b>
	)	
	)	
	)	
	)	

1           **PLEASE TAKE NOTICE** that pursuant to, *inter alia*, Bankruptcy Rules 2002, 3017, 9007  
2 and 9010, and 11 U.S.C. §§ 102(1) and 342, **Locke Lord LLP** hereby enters its appearance for  
3 International Brotherhood of Electrical Workers Local Union 1245 (“IBEW”), and request that  
4 copies of all notices given or required to be given in this case and all papers served or required to be  
5 served in this case, be served upon them at the following addresses:

6  
7           Meagan S. Tom  
8           **LOCKE LORD LLP**  
9           101 Montgomery Street, Suite 1950  
10          San Francisco, CA 94104  
11          Telephone: (415) 318-8810  
12          Fax: (415) 676-5816  
13          meagan.tom@lockelord.com

          W. Steven Bryant (*pro hac vice pending*)  
          **LOCKE LORD LLP**  
          600 Congress Street, Suite 2200  
          Austin, Texas 78701  
          Telephone: (512) 305-4700  
          Fax: (512) 305-4800  
          sbryant@lockelord.com

11          Bradley C. Knapp (*pro hac vice pending*)  
12          **LOCKE LORD LLP**  
13          601 Poydras Street, Suite 2660  
14          New Orleans, Louisiana 70130  
15          Telephone: (504) 558-5210  
16          Fax: (504) 910-6847  
17          bknapp@lockelord.com

15           **PLEASE TAKE FURTHER NOTICE**, that this Notice of Appearance and Demand for  
16 Service is not consent to the jurisdiction of the Bankruptcy Court or a waiver of any procedural or  
17 substantive right; and neither this nor any subsequent appearance, pleading, claim or suit is intended  
18 to nor shall it be deemed or construed as a waiver of (i) the right to have final orders in applicable  
19 matters entered only after a *de novo* review by a District Court Judge; (ii) the right to trial by jury in  
20 any proceeding so triable in these cases (iii) the right to have the reference withdrawn by the District  
21 Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights,  
22 claims, actions, defenses, setoffs, or recoupments to which IBEW is or may be entitled, in law or in  
23 equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly  
24

25       ///

26       ///

27       ///

1 reserved.

2  
3 Dated: January 29, 2019

Respectfully submitted,

4 LOCKE LORD LLP

5  
6 By: /s/ Meagan S. Tom

7 Meagan S. Tom

8 Attorneys for Creditor

*International Brotherhood of Electrical Workers Local Union 1245*